

July 28, 1982

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-320 OLA
)	
(Three Mile Island Nuclear)	
Station, Unit No. 2))	

LICENSEE'S RESPONSE TO STAFF'S MOTION
TO CONFORM PROPOSED TECHNICAL SPECIFICATION
IN ACCORDANCE WITH AMENDMENT OF ORDER

By Order of the Director, Office of Nuclear Reactor Regulation, dated February 11, 1980, the Commission established a set of formal license requirements reflecting the post-accident condition of the TMI-2 facility and assuring the continued maintenance of the current safe, stable, long-term cooling condition of the facility. The February 11 Order further provided that the requirements of the proposed Technical Specifications (attached to the Order) were immediately effective, with an opportunity for hearing prior to the effectiveness of the proposed formal license amendment. At the time the February 11 Order was issued, both the Staff and Licensee anticipated that, during the pendency of this matter, changes in the proposed Technical Specifications might be necessary as the facility status evolves as a result of ongoing recovery efforts.

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On June 16, 1982, the Director of the NRC Office of Nuclear Reactor Regulation issued an "Amendment of Order," to permit supervisory authority over the training of Radiological Control Technicians to be shifted from the Supervisor, Station Training to the Vice-President for Radiological and Environmental Controls.^{1/} By the July 13, 1982 "NRC Staff Notice of Issuance of Amendment of Order and Motion to Conform proposed Technical Specification In Accordance Therewith," the Staff has moved that the proposed Technical Specifications attached to the February 11, 1980 Order be formally modified in accordance with the June 16, 1982 "Amendment of Order," subject to the authority which 10 C.F.R. § 2.717(b) reserves to the Licensing Board in this proceeding.

As Licensee understands the Staff's motion, it is simply a request by the Staff that the Board issue an order notifying all parties that the proposed Technical Specifications under consideration in the prospective hearing requested in this proceeding are revised in accordance with the June 16, 1982 "Amendment of Order" (i.e., the document before the Board is revised to replace page 6-3 attached to the February 11, 1980 Order with pages 6-3 and 6-3a attached to the "Amendment of Order").

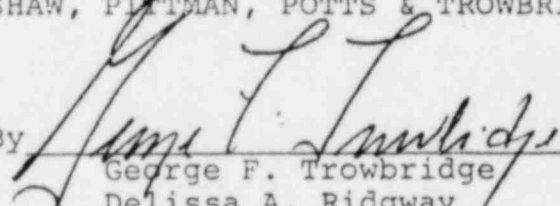
^{1/} As the copy of the "Amendment of Order" attached to the Staff's Notice and Motion indicates, the "Amendment of Order" was actually issued on June 16, 1982, not May 17, 1982 as is indicated in the text of the Staff's Notice and Motion.

The formal license amendment incorporating the proposed Technical Specifications, as amended, would await the outcome of the prospective hearing. With this understanding, Licensee does not oppose the motion.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

BY


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Dated: July 28, 1982

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Response To Staff's Motion To Conform Proposed Technical Specification In Accordance With Amendment Of Order" were served upon those persons on the attached Service List by deposit in the United States mail, First Class, postage prepaid, this 28th day of July, 1982.


Delissa A. Ridgway

Dated: July 28, 1982

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